

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

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|-----------------------|---|------------------------------------|
| In Re: |) | |
| Gerald & Melissa Cox |) | Case No. 15-47653-399 |
| |) | |
| |) | Chapter 13 |
| Debtors, |) | |
| |) | DEBTORS' RESPONSE TO |
| |) | TRUSTEE'S MOTION TO DISMISS |
| |) | FOR FAILURE TO MAKE PLAN |
| John V. LaBarge, Jr., |) | PAYMENTS |
| |) | |
| Movant, |) | |
| |) | |

DEBTORS' RESPONSE TO TRUSTEE'S MOTION TO DISMISS
FOR FAILURE TO MAKE PLAN PAYMENTS

COME Now Debtors, Gerald & Melissa Cox, by and through their attorney and responds to the Trustee's Motion to Dismiss for Failure to Make Plan Payments, and states;

1. Debtors agree to all statements in paragraph 1 through three.
2. Debtors are reviewing her payment records, and will be sending in all necessary funds to cure the current delinquency or in the alternative he will propose an amended plan.
3. Debtors request the Trustee's Motion be set for hearing.

WHEREFORE, Debtors respectfully request that this Court enter an order denying the Trustee's Motion to Dismiss; and for such other and further relief as this Court deems necessary and proper.

RESPECTFULLY SUBMITTED,

Walters & Edwards, LLC

/s/_Corrine E. Edwards
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PROOF OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing Debtors' Answer to Trustee's Motion to Dismiss, was mailed and/or electronically mailed to all parties listed below, including the Debtor, this 21st day of September, 2016.

/s/ Corrine E. Edwards

John Labarge- Via ECF Only
Chapter 13 Trustee
P.O. Box 430908
St. Louis, MO 63143

Gerald & Melissa Cox
3264 Janton Ln.
St. Charles, MO 63301